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VerStandig Broadcasting

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OFFICE OF THE CHAIRMAN

May 21, 1999

Chairman William Kennard
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Kennard,

My name is Susanne Mowbray and I am the Vice President of VerStandig Broadcasting and the General Manager of WSVa-AM, WQPO-FM, WAMM-FM, WHBG-AM, WBHB-FM in Harrisonburg, Virginia. The purpose of this letter is to go on record with expressing my concerns about an issue that could devastate our industry and have grave consequences on the country—low power radio. The reason I include the country is the dependency this country has on radio in times of disaster. If low power radio as you propose becomes a reality, radio will not be there serving the communities as it is today and communities will not receive vital information in an emergency. Now allow me to expand on the reasons why low power radio should not become a reality:

1. The first and most important issue is interference. It seems to me that with an issue this important, with devastating consequences, you should wait until all testing can be completed to even entertain low power FM.
2. It also seems to me that if you make the decision to go with low power FM now, you will be getting the cart before the horse so to speak. It is my understanding that we have made a commitment to digital radio and nearing the end of a long process to get there, and if you add low power FM now that process would have to start over. Why such urgency about this low power issue? Wouldn't it make more sense to wait until the industry completes the digital process and then consider low power radio, if you still believe it is worthwhile?

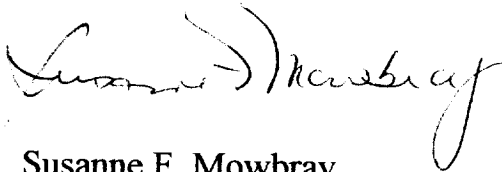
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WSVA 550AM WQPO 100.7FM WAMM 105.1FM WBHB 103.3FM WHBG 1360AM

3. There is a tower issue that doesn't seem to have been addressed yet. All over America the cellular phone companies and PCS companies along with broadcasters are faced with communities not wanting to destroy the landscape with towers and antennas. With what you propose those that do manage to secure their licenses to broadcast, might not ever get to broadcast because of this obstacle.
4. Why do we even need these new frequencies when we can't even fill the ones currently available? There are frequencies all over America available for anyone including minorities to secure. Keeping radio stations on air and of service to communities is a costly venture. Why haven't these minorities that you have referred to secure or even applied for these available frequencies?
5. The small markets of the country, where the majority of the low power FM signals would be, are extremely competitive today and most are in the business because of their passion for the industry and their commitment to serve their communities, not because they are making so much money. Allowing more competition for listeners which converts into ratings which turn into revenue, would force the present broadcasters to further streamline their operations and thus decrease or eliminate their ability to serve the local communities, thus not being there in times of emergency and disasters.
6. Now let's address the issue of Pirate broadcasters/resources. Why do they even exist? It seems to me that the FCC with it's limited resources can not even manage to enforce the laws now in affect. What makes you believe you could possibly manage such an enormous administrative undertaking as LPFM would be?
7. Looking at history, I have to ask how LPFM even got to be an issue? The 80/90 Docket was created for several reasons, one was to give an opportunity to minorities use of the airwaves. Well, in reality they either didn't want it bad enough to go through the process, couldn't afford it or couldn't make it work once they secured the license. The Tel Com bill never would have been conceived if not for the 80/90 docket which created all the available signals.

I sincerely hope that you will consider this issue with serious thought, explore other options to accomplish the intended goal, base your decision on sound information, and do what's best for our country.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Susanne F. Mowbray". The signature is fluid and somewhat stylized, with a large loop at the end of the last name.

Susanne F. Mowbray
VP/GM VerStandig Broadcasting